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Of Attorneys for State Defendants Hormann,
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

NICHOLAS JAMES MCGUFFIN, as an
individual and as guardian *ad litem*, on behalf
of S.M., a minor,

Plaintiffs,

v.

MARK DANNELS, PAT DOWNING,
SUSAN HORMANN, MARY KRINGS,
KRIS KARCHER, SHELLY MCINNES,
RAYMOND MCNEELY, KIP OSWALD,
MICHAEL REAVES, JOHN RIDDLE, SEAN
SANBORN, ERIC SCHWENNINGER,
RICHARD WALTER, CHRIS WEBLEY,
ANTHONY WETMORE, KATHY WILCOX,
CRAIG ZANNI, DAVID ZAVALA, ESTATE
OF DAVID E. HALL, VIDOCQ SOCIETY,
CITY OF COQUILLE, CITY OF COOS
BAY, and COOS COUNTY,

Defendants.

Case No. 6:20-cv-1163-MTK (Lead Case)
3:21-cv-1719-MTK (Trailing Case)

DECLARATION OF KRISTEN E.
HOFFMEYER IN SUPPORT OF STATE
DEFENDANTS' MOTION FOR EXCESS
PAGES OF MOTION FOR SUMMARY
JUDGMENT

VIDOCQ SOCIETY,

Cross-Claimant.

RICHARD WALTER,

Cross-Claimant.

NICHOLAS JAMES MCGUFFIN, as an
individual and as guardian ad litem, on behalf
of S.M., a minor,

Plaintiff,

v.

OREGON STATE POLICE,

Defendant.

I, Kristen E. Hoffmeyer, declare:

1. I am a Senior Assistant Attorney General with the Trial Division of the State of Oregon, Department of Justice. I am co-counsel for the state defendants in the above-captioned case.

2. By the accompanying motion, defendant is requesting leave to file a motion for summary judgment in excess of the 50-page limit set by this court. According to the court's order, the page limit is inclusive of all state defendants. Defendant is requesting additional pages for its motion in order to address the complexity of plaintiff's claims with respect to each of the state defendants.

3. As required by LR 7-1(a), I certify that I did attempt to confer with plaintiff's counsel by sending an email. At the time of filing, I have not received a response. I also conferred with counsel for other defendants, none of whom object.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on January 07, 2025.

s/ Kristen E. Hoffmeyer

KRISTEN E. HOFFMEYER

Senior Assistant Attorney General